

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

COOPER CAMERON CORPORATION,)
Plaintiff,)
v.) Civil Action No. 05-188-SLR
DRIL-QUIP, INC.)
Defendant.)

)

**PLAINTIFF'S UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO EFFECT SERVICE**

Pursuant to Federal Rules of Civil Procedure 4(m) and 6(b), plaintiff, Cooper Cameron Corp. moves for an order, in the form attached hereto, extending the 120-day period for service of the summons and complaint in this action upon defendant through and including September 27, 2005. The grounds for this motion are:

1. This action was filed on March 29, 2005. In order to facilitate settlement discussions, the defendant has not been served. Since the filing of the complaint, the parties have been actively discussing settlement of this case. The defendant has requested that plaintiff delay the service of process so that the parties can seek to effectuate a settlement.

2. Rule 4(m) permits 120 days to serve the complaint. Plaintiff believes that an additional 60 days to serve the complaint will allow the parties to further pursue settlement discussions without requiring them to incur the costs and expense of litigation. Counsel for the defendant has advised the plaintiff that it assents to the extension sought.

3. Rules 4(m) and 6(b) provide that the Court, in its discretion, may enlarge the time for cause shown.

MORRIS, NICHOLS, ARSHT & TUNNELL

/s/ Jack B. Blumenfeld

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July 27, 2005
476245

CERTIFICATION

The subject of the foregoing motion has been discussed with counsel for the defendant, and although counsel has not appeared for the defendant in this action, counsel for defendant has assented to the relief requested.

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld

Dated: July 27, 2005

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_____)

ORDER

The Court, having considered the Plaintiff's Unopposed Motion for Enlargement of Time to Effect Service:

IT IS HEREBY ORDERED that the time in which plaintiff Cooper Cameron Corp. may effect service of process of its Complaint is extended until September 27, 2005.

DATED this ____ day of July, 2005.

United States District Judge